

Exhibit 59

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3

4
5 IN RE: JOHNSON & JOHNSON)
6 TALCUM POWER PRODUCTS MARKETING,) MDL NO.
7 SALES PRACTICES, AND PRODUCTS) 16-2738(MAS)(RLS)
8 LIABILITY LITIGATION)
9

10
11 DEPOSITION
12 OF
13 PATRICIA G. MOORMAN, Ph.D.
14

15 Tuesday, February 13, 2024
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17

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1 testimony as well as the testimony of all of the
2 plaintiffs' experts were excluded, which I clearly
3 disagreed with, because the methodology that I
4 used is the same methodology that I've used in
5 this case, which has been approved by the court.
6 It's the same methodology that I used throughout
7 my career when I'm writing papers, writing grants,
8 reviewing papers, reviewing grants.

9 Q. And you've read that opinion?

10 A. I read -- yeah, a couple of years ago
11 I did read --

12 Q. The parts about you. It's a long
13 opinion, I understand.

14 A. Yeah.

15 Q. Is that what you're saying? You
16 focused in on --

17 A. Yeah, I read it a couple of years ago,
18 and I -- I can't say that I read every single word
19 of the opinion.

20 Q. I'm a lawyer. I thought the opinion
21 was long. Very thorough, but long.

22 Okay. So do you have any remaining
23 activities with UNC or Duke?

24 A. I am professor emerita in the
25 Department of Community -- yeah -- Family Medicine

1 and Community Health. They changed their -- the
2 department name a few years ago. And -- so I have
3 some privileges in that regard.

4 I am included on e-mails and so
5 departmental meetings, seminars and such like
6 that. I have access to the Duke library. Since I
7 have retired, once in a while, not too often, I
8 will be asked could I review something. But
9 that's about it.

10 Q. Do you know Katie O'Brien?

11 A. I have never met her, to my knowledge.
12 I obviously have read several of her papers.

13 Q. She lives in the Research Triangle.
14 That's why I asked.

15 A. Right. Yeah.

16 Q. But you've never come across her
17 professionally?

18 A. No. I believe that she works at
19 NIEHS. I know some of the people in that group,
20 but I don't believe that I have ever met her.

21 Q. Have you ever spoken to her,
22 communicated with her by email?

23 A. No, I have not.

24 Q. Did you reach out to her with any
25 questions about any of her papers?